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FELLOW, AMERICAN COLLEGE OF TRIAL LAWYERS

May 19, 2022

Via ECF and Email  
Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *U.S. v. Adiel Peguero*  
21 Cr. 541 (CM)

Dear Judge McMahon:

I write today to respectfully make two requests of the Court.

Back in February, I requested and your Honor granted, counsel's request to have an attorney from the Mentorship Program appointed to work on Mr. Peguero's case. Unfortunately, that relationship never materialized. Since then, Mr. Peguero's case has proceeded without complication. Mr. Peguero pleaded guilty in March 2022, and is awaiting sentencing, which is currently scheduled to take place on June 9<sup>th</sup>.

I am writing to request that Honor appoint a new mentee, Bernarda Villalona, Esq., to work on the sentencing phase of Mr. Peguero's case. I make this request for several reasons. First, the sentencing aspect of all of our cases is critical – and while Ms. Villalona has had some valuable trial experience in our program – we like the mentees to also focus on the need to improve writing skills, particularly during the sentencing phase.

Second, and critically, Ms. Villalona is a native Spanish speaker, which will solve the problem that many lawyers are currently having, as the courts and the jails re-open, which is difficulty finding sufficient Spanish interpreters. A side benefit of Ms. Villalona's appointment would be a cost savings because we would not have to engage a Spanish language interpreter in order to communicate with Mr. Peguero or his family. Ms. Villalona will, of course, work under my supervision, as required by the Program, subject to the approval of the client and the Court.

① Accordingly, I respectfully request that your Honor appoint Ms. Villalona as associate counsel and that she be reimbursed at the establishing rate for participants in the Program, after she has completed the mandatory 15 *pro bono* hours. Ms. Villalona's CV is attached for your Honor's review.

② My second request is that your Honor adjourn Mr. Peguero's sentencing until the early Fall. That will give us sufficient time to appropriately prepare for his sentencing. Ms. Villalona's appointment will make review of the Pre-Sentence Report with Mr. Peguero far less cumbersome and more efficient – substantively and from a cost perspective. Accordingly, counsel respectfully requests that your Honor adjourn Mr. Peguero's sentencing until the Fall.

I have discussed this request with government counsel and the government has no objection to counsel's request for an adjournment of Mr. Peguero's sentencing until the Fall.

Your Honor's consideration of this request is greatly appreciated.

SO ORDERED

Loretta A. Preska  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

5/19/22

cc: All Counsel

Respectfully submitted,

Susan G. Kellman

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